

EXHIBIT 1

DECLARATION OF JILL COKER

1. Since 2012, I have served as Controller for Consolidated Industries, LLC, d/b/a Weather King Portable Buildings ("Weather King").

2. I have reviewed Defendants' Response to Plaintiff's Motion to Compel Supplementation of Discovery Responses, filed June 7, 2023, and I know that certain of the statements therein are false.

3. For instance, on page 10, the Defendants state that "the cell phones and laptops Defendants used when working at Weather King were owned by Weather King and therefore returned to Weather King upon each Defendants [sic] discharge." This statement is false.

4. Weather King did not own or purchase any of the cell phones (or smartphones) used by any of the Defendants in 2022, nor were any of the Defendants even on a Weather King cell phone plan.


5. Weather King reimbursed certain employees who conducted a lot of company business from their cell phones (such as salespersons and production managers) \$100 per month toward their cell phone plan, including Jesse Maupin, Barry Harrell, Adrian Harrod, and Logan Feagin. Those Defendants were on their own cell phone plan. Weather King did not provide reimbursements for any cell phone usage by Stephanie Gillespie, Ryan Brown, Daniel Hershberger, Brian Lassen, or Aleyna Lassen.

6. Before July 2015, Weather King owned phones that Mr. Maupin and Mr. Harrell used and that were on Weather King's Verizon plan. However, Weather King ceased that plan in July 2015, and after that point, Weather King did not own any future phones. Mr. Harrell was employed by Weather King from March 2010 until February 2015, as well as from January 27, 2020, until June 1, 2022, and to the best of my recollection, he returned his Weather King cell phone when he left in February 2015.

7. The Defendants' suggestion that they returned their cell phones upon their termination in June 2022 is also false. None of the Defendants provided Weather King with any cell phone, nor would they have because Weather King did not own any of them.¹

8. To my knowledge, Mr. Maupin, Mr. Harrell, Mr. Harrod, and Mr. Feagin were the only Defendants who ever made use of a Weather King laptop. After the Defendants' departure, one laptop was left in Weather King's Paris, Tennessee office. However, a factory re-start had been instituted and the data on the device was wiped, so Weather King does not know who made use of that device.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.


JILL COKER

Date: June 16, 2023

¹ The suggestion that Weather King "discharge[d]" each of the Defendants is also false. Although Weather King discharged Mr. Maupin after uncovering the Defendants' scheme, the other individual Defendants all quit.